

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA Division**

In re:

APRIL R WESCOTT

Debtor

Chapter 13

Case No. 20-11258-amc

**AFFIDAVIT IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

I, Joelly M. Carvajal, declare under penalty of perjury as follows:

1. I am employed as a Contract Management
coordinator of PHH MORTGAGE CORPORATION
and am authorized to sign this Affidavit on behalf of PHH MORTGAGE
CORPORATION, as Servicer for DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR MORGAN STANLEY HOME EQUITY LOAN
TRUST SERIES 2006-3 (the "Movant"). This Affidavit is provided in support of the
Motion for Relief from Stay (the "Motion") filed contemporaneously herewith.
2. I make this affirmation based upon my review of the records with regard to this
underlying loan transaction, which are kept in the ordinary course of business of PHH
MORTGAGE CORPORATION. As part of my job responsibilities for PHH
MORTGAGE CORPORATION, I have personal knowledge of and am familiar with the
types of records maintained by PHH MORTGAGE CORPORATION in connection with
the loan that is the subject of the Motion (the "Loan") and the procedures for creating
those types of records, I have access to and have reviewed the books, records and files of
PHH MORTGAGE CORPORATION that pertain to the Loan and extension of credit
given to Debtors concerning the property securing such Loan.
3. The information in this affidavit is taken from PHH MORTGAGE CORPORATION's
business records regarding the Loan. The records are: (a) made at or near the time of the
occurrence of the matters recorded by person with personal knowledge of the information
in the business record, or from information transmitted by persons with personal
knowledge; (b) kept in the course of PHH Mortgage Corporation's regularly conducted
business activities; and (c) it is the regular practice of PHH MORTGAGE
CORPORATION to make such records.
4. NOVARRA MCCALL, DECEASED has executed and delivered or is otherwise
obligated with respect to that certain promissory note referenced in the Motion (the

“Note”). NOVARRA MCCALL, DECEASED and APRIL R WESCOTT have executed and delivered or are otherwise obligated with respect to that certain Mortgage referenced in the Motion (the “Mortgage”). Pursuant to that certain Mortgage referenced in the Motion, all obligations of the Borrowers under and with respect to the Note and the Mortgage are secured by the property referenced in the Motion.

5. As of May 8, 2020, there are one or more defaults in paying Debtor’s post-petition amounts due with respect to the Note.
6. As of May 8, 2020, the total unpaid principal balance is \$49,641.14 which includes the unpaid principal balance of \$34,536.14 and deferred principal balance of \$15,105.00.
7. The monthly post-petition payment amount is \$617.09. The following chart sets forth those post-petition payments, due pursuant to the terms of the Note, that have been missed by the Debtor as of May 8, 2020:

Number of Missed Payments	From	To	Monthly Missed Principal and Interest	Monthly Missed Escrow (if applicable)	Monthly Payment Amount	Total Amounts Missed
3	03/01/2020	05/01/2020	\$146.21	\$470.88	\$617.09	\$1,851.27
Less post-petition partial payments (suspense balance):						\$0.00
Total:						\$1,851.27

8. As of May 8, 2020, the total post-petition arrearage/delinquency is \$1,851.27 consisting of (i) the foregoing total of missed post-petition payment in the amount of \$1,851.27 plus (ii) the following post-petition fees:

Description	Amount
n/a	n/a

9. Attached hereto as Exhibit “A” is a post-petition payment history.
10. As of May 8, 2020, the debtor is in default for failure to make timely post-petition payments in the amount of \$1,851.27.

11. The pre-petition arrearage is \$3,175.43 pursuant to the Proof of Claim filed by Movant. As of the date of this affidavit, the Chapter 13 plan **has not** been confirmed.

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 14 day of June, 2020.

John M. Cezar

Signature

Joelly M. Carvajal

Name

Name Contract Management Coordinator

Title

PHH MORTGAGE
CORPORATION, as
Servicer for DEUTSCHE
BANK NATIONAL TRUST
COMPANY, AS TRUSTEE
FOR MORGAN STANLEY
HOME EQUITY LOAN
TRUST SERIES 2006-3

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 16 day of JUNE, 2020, by Joelly M. Carvajal as Contract Management Coordinator for PHH Mortgage Corporation, as Servicer for DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY HOME EQUITY LOAN TRUST SERIES 2006-3, who is personally known to me or who has produced _____ as identification.

Signature of Notary Public

Claribel Lopez

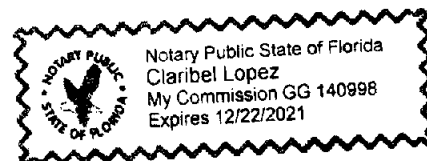
Name of Notary Public:

Notary Commission Expiration Date: 12/22/2021

Personally known: X

OR Produced Identification: _____

Type of Identification Produced: _____



**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

IN RE:

APRIL R WESCOTT

Debtor

: BK. No. 20-11258-amc

:

: Chapter No. 13

:

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR MORGAN
STANLEY HOME EQUITY LOAN TRUST
SERIES 2006-3**

:

:

:

:

Movant

:

: 11 U.S.C. §362

v.

:

APRIL R WESCOTT

:

Respondent

Exhibit "A"

Name:	April R Wescott				Completed By:	Avinash
BK Case Number:	20-11258-amc					
Filing Date:	02/28/2020					
Post First Due:	03/01/2020					
Post-Petition Due	Date Received	Amount Received	Amount Applied	Suspense Application	Suspense Balance	Comments
				\$ -	\$ -	
No Payments Received				\$ -	\$ -	
				\$ -	\$ -	

Name:	April R Wescott			
BK Case Number:	20-11258-amc			
Filing Date:	02/28/2020			
Completed by:	Avinash			
Due Date	Total Payment	P&I	Escrow	NOPC Filed Date
03/01/2020	\$ 617.09	\$ 146.21	\$ 470.88	
04/01/2020	\$ 617.09	\$ 146.21	\$ 470.88	
05/01/2020	\$ 617.09	\$ 146.21	\$ 470.88	
	\$ -			
Total Due	\$ 1,851.27	\$ 438.63	\$ 1,412.64	